

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:) Chapter 11
)
KRISTAL C. OWENS f/k/a KRISTAL C.) Case No. 19-24274-GLT
OWENS-GAYLE,)
)
Debtor.)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Section 1109 of the Bankruptcy Code and Rule 9010 of the Bankruptcy Rules, the counsel set forth in this Notice hereby appears as counsel for OPA-Hi Development LLC (“OPA-Hi”), in this case.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by those Rules, and pursuant to Section 1109(b) of the Bankruptcy Code and Rule 9010 of the Bankruptcy Rules that all other notices given or required to be given to OPA-Hi in this case be given to and served upon:

Brett A. Solomon, Esquire
Solomon Legal Group
1384 Old Freeport Road, Suite 2BF
Pittsburgh, PA 15238
Ph: 412-406-8946
Fax: 877-733-4978
Email: brett.solomon@solomon-legal.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, plans of reorganization, answers or reply papers, memoranda or briefs in support of any of the foregoing and any other document brought before the Court with respect to these proceedings, whether formal or informal, whether written

or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopier or otherwise.

PLEASE TAKE FURTHER NOTICE that OPA-Hi intends that neither this Notice of Appearance and Request for Service of Papers nor any later appearance, pleadings, claim or suit shall waive (1) the right of OPA-Hi to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge, (2) the right of OPA-Hi to trial by jury in any proceeding so triable in this case or any other case, controversy or proceeding related to this case, (3) the right of OPA-Hi to request that the United States District Court withdraw the reference or abstain, in any matter subject to mandatory or discretionary withdrawal or abstention, (4) any other rights, claims, actions, defenses, setoffs or recoupments to which OPA-Hi is or may be entitled under agreements, in law, at equity, or otherwise, all of which are expressly reserved; (5) any objection to the jurisdiction of this Bankruptcy Court for any purpose, and (6) any election of remedy.

All of the above rights are expressly reserved and preserved unto these parties without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in this case or any controversy or proceeding related hereto.

Dated: July 13, 2020

/s/ Brett A. Solomon
Brett A. Solomon, Esq. (Pa. ID 83746)
SOLOMON LEGAL GROUP
1384 Old Freeport Road, Suite 2BF
Pittsburgh, Pennsylvania 15238
(412) 406-8946

Counsel for OPA-Hi Development LLC

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CERTIFICATE OF SERVICE

I certify that on July 14, 2020, I served or caused to be served a copy of the foregoing Notice of Appearance and Request For Service Of Papers upon each of the persons and parties in interest at the addresses shown below as indicated:

SERVICE BY E-MAIL

Jennifer L. Cerce, Esquire on behalf of Creditor Wilkinsburg School District and Borough of Wilkinsburg (jlc@mbm-law.net)

Jeffrey R. Hunt, Esquire on behalf of Creditor County of Allegheny (jhunt@grblaw.com; cnoroski@grblaw.com)

Jill Locnikar, Esquire on behalf of United States of America Department of Treasury, Internal Revenue Service (jill.locnikar@usdoj.gov)

Larry E. Wahlquist, Esquire on behalf of US Trustee Office (larry.e.wahlquist@usdoj.gov)

SERVICE BY FIRST CLASS MAIL

Wells Fargo Home Mortgage P.O. Box 10335 Des Moines, IA 50306	Brian H. Smith, Esquire Law Offices of Lamm Rubenstone LLC 3600 Horizon Boulevard, Suite 200 Feasterville Trevose, PA 19053
Donald R. Calaiaro, Esquire Calaiaro Valencik 938 Penn Avenue, Suite 501 Pittsburgh, PA 15222	

/s/ Brett A. Solomon
Brett A. Solomon (Pa. ID 83746)
Counsel for OPA-Hi Development LLC